

October 15, 2010

Mr. Don West
Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Ms. Deborah Orr
EPA Region V
77 West Jackson Boulevard
Chicago, IL 60604-3507

Dear Mr. West and Ms. Orr:

The City of Rockford is pleased to submit our application to the USEPA for a \$ 200,000 Cleanup Grant for the former Amerock Site on South Main Street. This property is City-owned and includes what was once 230,000 square foot, 13-story manufacturing building and a former gas station site on a parking lot north of the building. The site is located within an economically distressed area of the City and adjacent to the Davis Park and near the Rock River. The City has conducted site assessment activities and found that in order to redevelop and reuse the existing structure, the asbestos, lead-based paint and petroleum need to be addressed. The cleanup dollars provided by the requested grant will provide the City with the catalyst for the redevelopment of the site into a Mixed- Use development with retail, such as restaurants, complimenting Davis Park and other uses bringing residents, workers, and students to this site on a 24 hour basis. Nearby Brownfield properties are likely to be redeveloped as a result of this catalyst, especially the former warehouses along Cedar Street and the Warshawsky property, and the adjacent Tapco building is proposed to be cleared for the expansion of Davis Park.

This area is in desperate need of the opening up of Davis Park and the Rock River to public use. The site overlooks the Rock River and Davis Park, but is currently a detriment to the Park because it is vacant and deteriorating. Our goal is to redevelop this site through the adaptive reuse of this large vacant building in a way that will bring pedestrian activity and enhance the adjacent public open space amenity with both active and passive uses. The proposed removal of the adjacent Tapco Building and expansion of Davis Park into that space would further enhance the City's efforts at the Amerock Building site.

Applicant Identification: City of Rockford, 425 East State Street, Rockford, Illinois, 61104

- a) **Funding Requested:** \$200,000
- b) Grant Type: Cleanup Grant
- c) Contamination: Hazardous Substances; Petroleum
- d) : Site-specific

Location: City of Rockford, Winnebago County, State of Illinois

Chief Executive: Mayor Lawrence J. Morrissey

425 East State Street, Rockford, Illinois 61104
P: 815.987.5590 F: 815. 967.6952
Email: jennifershelton@rockfordil.gov

Project Contacts: Wayne Dust, AICP, Planning Administrator
Department of Community and Economic Development
425 East State Street, Rockford, Illinois 61104
P: 815.987.5636 F: 815.967.6933
Email: wayne.dust@rockfordil.gov

Date Submitted: October 15, 2010

Project Period: October 2011 – September 2014

Population: 150,115 (2000 Census)

Other: The City of Rockford is a State designated Enterprise Zone and a “Labor Surplus Municipality”

Cooperative Partners: Rockford Park District (Tim Dimke, 815.987.8800, including the Burpee Museum of Natural History; Rockford Local Development Corporation (John Phelps, 815.987.8675); Rockford Area Economic Development Council (RAEDC) Janis Fadden , 815.965.3606); Comprehensive Community Solutions, Inc. (Kerry Knodle, 815.963.6236)

We are at a very critical juncture at this site due to the necessary cleanup costs that are required for reuse as a mixed use development and the sheer size of this structure. In addition to this City-owned site, the City will be attempting to negotiate the acquisition of an adjacent site, the Tapco site. This second site combined with the existing City-owned Amerock site dramatically increases the opportunity to create a substantial mixed-use development with an enhanced adjacent public recreational facility. New opportunities are always on the horizon.

Very truly yours,

Lawrence J. Morrissey
Mayor
City of Rockford

LJM/jls

Project Description

Threshold Criteria for Cleanup Grant

1. Applicant Eligibility

Rockford is a municipal corporation formed by the authority of the State of Illinois. Rockford is eligible to apply for Cleanup Grants from the USEPA. The City of Rockford currently owns the Proposed Cleanup Site which is the former Amerock site located on South Main Street and adjacent to Davis Park. The City intends to perform remediation activities on this site; after which time the site will be redeveloped for mixed commercial and residential uses.

2. Letter from the State or Tribal Environmental Authority

The Letter from the Illinois Environmental Protection Agency is provided in Attachment A.

3. Site Eligibility and Property Ownership Eligibility

Site Eligibility

a. Basic Site Information

- (a) Name of the Site: Former Amerock Site
- (b) Address: 416 South Main Street, Rockford, Ill. 61101
- (c) Current Owner: The City of Rockford
- (d) Date of Ownership: The City of Rockford acquired this property on May 12, 2010.

b. Status and History of Contamination at the Site

- (a) Type of Contaminant: Hazardous Substances and Petroleum
- (b) Operational History and Current Uses: Amerock has been the site of several manufacturing operations within the large structure, and the parking lot to the north is the site of a former gas station .
- (c) Environmental Concerns: The environmental concerns for the former Amerock Site consist primarily of lead-based paint, asbestos materials, metal plating activities, solvents used to degrease parts and the potential for petroleum products from historic gas station useage. Phase I and Phase II environmental site assessments (ESA) were conducted on this site. The Phase I indicated that the

former industrial/manufacturing nature of the site and surroundings properties was an environmental concern. The Phase II ESA, completed in September of 2008, indicated metals and solvents were found in the soil and groundwater samples . An asbestos survey was conducted in October of 2010, and this survey revealed asbestos in several areas within this large structure.

(d) Nature and Extent of the Contamination: This site became contaminated due to its historical use as a manufacturing facility and due to the age of the facility, where lead based paint and asbestos containing materials were regularly used in the construction process. The building was found to contain lead-based paint and asbestos containing materials. Contaminants of concern in the soil exceed TACO Residential Soil and Groundwater Remediation Objectives. The primary contaminants of concern are the metals and solvents.

c. Sites Ineligible for Funding

(a) Listing on NPL: The site is not and is not proposed to be listed on the National Priorities List.

(b)CERCLA: The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA

(c)United States Government: The site is not subject to the jurisdiction, custody, or control of the United States Government

d. Sites Requiring a Property-Specific Determination

The former Amerock Site does not require a Property-Specific Determination. This site is eligible for funding from the USEPA.

e. Environmental Assessment Required for Cleanup Proposals

A Phase I ESA was conducted on the properties during the spring of 2008 and again in 2010 just prior to City Acquisition on May 12, 2010. These Phase I ESAs conformed with ASTM E1527-05. A Phase II ESA was conducted on the property in September of 2008. The results of the Phase II investigation were summarized in a Comprehensive Site Investigation Report.

f. CERCLA 107 Liability The City of Rockford is not a potential liable party for contamination at this Site under CERCLA's bona fide prospective purchaser provision. The City has provided proof that this provision was met to the USEPA Region V Brownfield Division for previous grant opportunities, the FY2008 Assessment Grants, for the former Amerock manufacturing facility.

g. Enforcement Actions - The City is not aware of any enforcement actions for this property. The City of Rockford has enrolled the site into the Illinois EPA voluntary Site Remediation Program with the intent of receiving a No Further Remediation (NFR) letter for the property.

h. Information on Liability and Defenses/Protections

i)Information of Property Acquisition: The City of Rockford purchased the property on May 12,2010 as a result of an effort to purchase Downtown and riverfront Brownfield sites to restore the Riverfront to Public Access and public use. The previous owner was Associated Bank. The City is the sole owner of the property.

- Acquired Ownership: The City of Rockford Acquired Ownership by negotiated purchase from a private banking company
- Date of Acquisition: The City of Rockford acquired the property on May 12, 2010 following the completion of a Phase I ESA
- Type of Ownership: The City of Rockford has fee-simple title to this property
- Previous Owner: Associated Bank.
- The City of Rockford had no familial, contractual, corporate or financial relationships with any prior owners or operators or potentially responsible parties

ii)Timing and /or Contribution Toward Hazardous Substance Disposal: Any disposal of hazardous substances occurred at the site prior to ownership by the City of Rockford. The City has not caused or contributed to any release of hazardous substances at the site. The City has not arranged and will not arrange to have hazardous substances disposed of or transported to the site.

iii)Pre-Purchase Inquiry: The City of Rockford performed a Phase I ESAs in accordance with ATSM E1527-00 in 2008 and 2010 and conducted a Phase II ESA in 2008 all through the use of USEPA Brownfield Assessment Grants. The Phase I and Phase II ESAs were performed by Fehr-Graham and Associates, a regional engineering/environmental professional consulting firm.

iv)Post-Acquisition Users: The City of Rockford has not used this building or site.

v)Continuing Obligations – The City has installed a controlled access system so that no unauthorized persons have access to the property. This controls any illegal activities that may occur at abandoned facilities. The City has entered the property into the IEPA voluntary remediation program. The City has conducted Phase I and Phase II ESAs in accordance to both the USEPA Brownfield program and the IEPA Site Remediation Program to determine if there are any concerns to human health and the environment. This cleanup grant opportunity will facilitate the removal of asbestos from the structures and petroleum from the property so that the property may be redeveloped and the Rock River will be protected from potential release of the petroleum from the water table to the Rock River. The City of Rockford will comply with all of the land use restrictions and institutional controls that are applicable to the property's remediation activities. The City will provide full access to the contractor's responsible for the remediation activities at the site. The City will comply will all information requests and administrative subpoenas that have or may be issued in connection with the property. Any legal notices required as part of remediation activities will be provided by the City of Rockford.

i) Petroleum Sites – This is a combined site.

4.Cleanup Authority and Oversight Structure

1. The City of Rockford has already entered the site into the IEPA Site Remediation Program SRP. This is a voluntary based cleanup program for the State of Illinois. The City has prepared

all of the documentation for the property and submitted this documentation for review and approval. The last remaining step under this program is the cleanup activities for the site. The City is preparing this grant application in the hopes of acquiring the necessary dollars to conduct cleanup activities for the site. Remedial action for the property will be carried out in accordance with the IEPA SRP as well as any City ordinances for construction or demolition and the Winnebago County Health Department. An environmental consultant will conduct cleanup oversight and will provide details of the cleanup activities. A Remedial Action Completion Report (RACR) will be submitted to the City of Rockford, to demonstrate that remediation has occurred, and to the IEPA in order for the site to receive a NFR.

2. The City of Rockford will not require access to adjacent properties to conduct either the asbestos or the petroleum cleanup; therefore, access to these properties is not a concern for the remediation activities.

F. Cost Share

The City of Rockford will provide for the 20% cost share of the \$200,000 cleanup grant through the use of programmatic expenses. The \$40,000 will be made up from:

- the labor hours of the Brownfield Coordinator for management and oversight of the cleanup activities.
- the City's public works department to prepare and solicit public bids for the remediation activities at the site and the management of these contractors.
- Legal fees in relation to cleanup activities and the filing and reviewing of the NFR. The review fees applied by the IEPA SRP to review and provide for the NFR will be paid by the City of Rockford.
- The Resolution committing the City to this local match is attached as Attachment C
- The Community Notice Documentation, summary of comments received, meeting notes and sign in sheet are provided in Attachment D.

1. Community Need

a. Health, Welfare and Environment: The City of Rockford, Illinois, was once a thriving manufacturing community, but has since faced decades of economic decline. Rockford was designated by the State of Illinois as an Enterprise Community in 1989; a designation based on poverty, unemployment, and economic growth factors. Prior to 2006, the City had created fourteen (14) Tax Increment Finance (TIF) districts in recognition of the area's continuing physical distress and economic decline. During 2006 through October of 2008 an additional ten (10) TIF Districts were created and an additional nine are currently in process. During 2003, The Global Trade Park Industrial Recovery Redevelopment Planning Area was created under the authority of Illinois law. Rockford qualified for this special redevelopment planning area designation because of unemployment above the state average. During 2005, the Harrison/Kishwaukee Redevelopment Planning Area was created in an area especially burdened with abandoned industrial properties. During 2007 the City of Rockford was designated as a River Edge Zone Community, one of only three designated by the State of Illinois. In the process of

preparing an extensive application for this designation, the City of Rockford quantified the extent of Brownfields located within the River Edge Zone: 665 Acres on 371 parcels all within approximately 1500 feet of the Rock River. The Amerock site is within 250 feet of the Rock River.

This Brownfield effort is targeted for the West side of Rockford, especially for the economically distressed area west of the Rock River and South of Auburn Street. Within this area, focus will continue to be on Riverfront areas in and near the Downtown area, such as the Amerock site on the south edge of Downtown. Focus will also continue along major transportation corridors such as South Main Street (the Amerock site is at 416 S. Main Street), West State Street, and Auburn Street and deteriorated industrial areas in and near rail yards and rail lines to the south and west of Downtown. In addition, two (2) riverfront Brownfield areas near Downtown on the east bank of the Rock River will also be included as targeted areas. As a whole, the Targeted Brownfield Area includes Census Tracts 25 through 32, 11 through 13, 8 and 10.

i) Effect of Brownfields on targeted community: In the eight (8) Targeted areas, brownfields have a severe impact on adjacent neighborhoods. Once thriving areas with workers and retail serving these workers, these Brownfields now contribute to crime and deterioration of the surrounding neighborhoods and form physical barriers to normal social interaction. In many ways, Brownfields such as the South Main Street /Water Power District area form physical and psychological barriers between adjacent neighborhoods to the south and west and the Downtown which lies north of this Brownfield. This area is particularly foreboding to pedestrians who are never seen in the 600 through 800 Blocks of South Main Street on either side of the street. Over time this area has experienced a major decline in population. The Near West and Southwest area surrounding and including 5 of the 8 Targeted Brownfields, defined as Census Tracts 25 through 29, is the area with the most extensive concentration of Brownfields. The population in this area has declined from 22,093 in 1960 to 16,614 in 1980 and to only 14,418 in 2000. This area has 70 Acres of Brownfield sites on 81 parcels, according to the River Edge Application prepared by the City. The Amerock site is located in Census Tract 29.

ii) Sensitive populations: Rockford is a diverse community with a minority population of 31.6% according to the 2000 Census. For the City as a whole, the African-American population is 17.2% of the total population, while the Hispanic or Latino population is 10.5 % of the total population. Also, 14% of the total population is living below the poverty level with 10.5% of families living below the poverty level in Rockford. Median household income was \$37,667. For the Targeted Brownfield Area as a whole, the minority population is 53.4%, the African-American population is 35.0%, the Hispanic population is 18.4% and those below the poverty level comprise 28.9% of the population and 24.6% of families. The Near West and Southwest Targeted Subarea, described above, has a strong concentration of sensitive populations and strong concentrations of poverty, poor housing, and limited services. This subarea has a minority population of over 75%, an African American population of 52.3%, a Hispanic or Latino population of 24.4%, and a persons living below the poverty level of 35.6%, over one third of the total population of this area. Nearly one third of all the families, 32.1%, are living below the poverty level. Median household income is roughly half that of the City as a whole, \$19,661. In the Targeted Brownfield Area, 21% of the households are single-parent families, and 9.7% of the households have public assistance income. In the Near West and Southwest Subarea, 26.4 % of the households are single parent families compared to only 14% in

the City as a whole and 10.3% of the households have public assistance income compared to 4.5% in the City as a whole.

In addition to these sensitive population, health and welfare indicators, the Targeted Brownfield area has a higher percentage of young children (under 10) than the City as a whole, 18.40% compared with 15.28% , a higher percentage of children under 18 than the City overall, 31.47% compared to 26.66% and a higher percentage of women of child-bearing age (15-49) than the City overall, 26.03% versus 24.94%. The concentration of children is even more pronounced in the Near West and Southwest Subarea, with an 18.95% (15.28% City) figure for children under 10 and 33.4% (26.66% City) for children under 18. (US Census 2000) The Targeted Brownfield Area and the Near West and Southwest Targeted Subarea are predominantly renter-occupied areas, with owner-occupied units accounting for only 37.5 % and 37.8%, respectively, of the occupied units compared to 61.1% in the City as a whole. The housing stock has a median year built of 1944 and 1950, respectively, compared to 1958 for the City as a whole and 12.8% and 13.2%, respectively, of the housing units were vacant in 2000 compared to 6.9 % vacant units in the City as a whole. (US Census 2000).These demographics clearly demonstrate the concentration of sensitive populations within the Targeted Brownfield Areas and the Near West and Southwest Subarea.The Amerock Site is located within this Subarea.

b.Financial Need

i) Economic Impact of Brownfields: The 2000 Census reported unemployment in the City of Rockford at 4.7%. Average unemployment for 2005 was estimated at 8.1% for the entire City, but was 19.4% in the Near West and Southwest Targeted Subarea. Three of the included Census Tracts were over 20% unemployment for 2005. The City currently has an unemployment rate of --- (Illinois Monthly Labor Force Report, Illinois Department of Employment Security).The Near West and Southwest Targeted Area can be expected to have an unemployment rate of ---. 2000 Census data also reveals that 22% of the City's population 18 and over never finished high school, while, in the Near West and Southwest Subarea the figure was 48.4 %. For the entire Targeted area, the figure is 38.4%, still considerably higher than the City average. Median income levels are \$24,173 for the Targeted Area and \$19,861 for the Near West and Southwest Targeted Subarea, both considerably lower than the City-wide median of \$37,667. (US Census 2000, except as noted)

It is no coincidence that the Targeted Brownfields Area and, especially, the Near West and Southwest Targeted Subarea demonstrate such high levels of economic need. The combination of the concentration of Brownfields, lack of basic retail and other services, the aging housing stock and general lack of investment by the private sector have resulted in a precipitous decline in the viability of these neighborhoods. This trend will continue unless these Brownfields are assessed, cleaned and redeveloped.

ii) Funding and resource limitations: Although the City of Rockford has received four (4) USEPA Brownfield Cleanup Grants, these Cleanup Grants only account for 20 acres of Brownfields of the 665 Acres of Brownfields that have been inventoried. the first three Grants , FY 2001, FY2004, and FY 2006 have been completely exhausted. The FY 2008 Assessment Grant is over 75% completed, with the remaining 25% committed for three Brownfield sites. The FY 2008 Assessment Grant is expected to be exhausted during the second quarter of FY 2009.

Although the assessment work will have been completed at the Barber Colman site and the Ingersoll site by that time, these two sites only account for 20 acres of the 665 Brownfield Acres in the River Edge Zone, only a portion of the City. Some progress has been made at other targeted Brownfield sites, such as the West State Street Corridor where approximately 20% of the 47 Brownfield sites have had Phase I ESAs or Phase II ESAs performed and the Downtown where approximately 10% of the Brownfield sites have had Phase I or Phase II ESA performed. Other than eligibility determinations, however, the other Targeted Brownfield areas have had very limited environmental assessment work performed due to the exhaustion of the Assessment Grants.

The River Edge program of the State of Illinois provides Assessment and Cleanup funds to the City for City-owned Brownfields but only if the City is able to enter into an Agreement with a Developer to redevelop the site. The City has found very limited interest by Developers in these Brownfield sites unless they have already been Assessed and Cleaned, thus placing the financial burden on the City and the USEPA Assessment Grant Program.

2. Project Description and Feasibility of Success

- a. Project Description: The City of Rockford proposes to perform the following Cleanup Activities at this site: 1) Removal of asbestos containing materials from aloof the buildings on this site; and 2) remove the petroleum product located under the slab foundation and resting on top of the water table.
- b. Budget for EPA Funding and Leveraging Other Resources
 - i) Budget Table

Budget Categories	Project Tasks				
	Task 1	Task 2	Task 3	Task 4	
(programmatic costs only)	Community Involvement	Cleanup Planning / Action Plan	Site Cleanup	Site Cleanup Oversight	Total
Personnel					
Fringe Benefits					
Travel ¹					
Equipment ²					
Supplies					
Contractual ³		\$10,000	\$180,000	\$10,000	\$200,000
Other (specify)_____					
Subtotal					
Cost Share	\$5,000	\$10,000	\$15,000	\$10,000	\$40,000
Total	\$5,000	\$20,000	\$195,000	\$20,000	\$240,000
Notes:					
1 Travel to Brownfield-related training conferences is an acceptable use of these grant funds.					

2	EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies.
3	Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48

Task 1: Community Involvement

The objective of this task is to inform the community as a whole and the community within the site Area of the City's intent to conduct environmental cleanup activities and provide details on cleanup plans and redevelopment efforts for the site. The City intends to rely primarily upon the following Community Outreach efforts 1) monthly Ward Meetings conducted in the Property Area (Alderman Doug Mark) 2) Planning and Development Committee Meetings of the City of Rockford, which are open to the public, published in all the media, and reported upon by the media; 3) the City of Rockford Website, press releases and legal notices in the local newspapers. and 4) the monthly meetings with the Brownfield Community Partners.

.Task 2: Cleanup Planning/ Action Plan/ Cleanup Bid Specifications/ RFP Process

The local Brownfields Coordinator, Wayne Dust, Planning Administrator for the City of Rockford, coordinates with the Illinois Environmental Protection Agency on a regular basis, including the enrollment of sites in the SRP and the review of the Remedial Action Plans. Mr. Dust has also attended the 2004, 2005, 2006 and 2008 USEPA/ ICMA National Brownfields Conferences and has benefited from the excellent training provided at these conferences. He will attend future National Brownfields Conferences.

Mr. Dust will use his experience on past cleanup projects to manage and oversee the activities that are necessary prior to cleanup activities. This includes the preparation of bid specifications for contractors to ensure the appropriate tasks are completed, the required regulations are followed. The also allows the City to obtain fair pricing and follow the appropriate procurement process. The \$20,000 budgeted for this Task includes Contractual of \$10,000 and City Cost Share of \$10,000

Task 3: Site Cleanup

As part of the Phase II ESA an asbestos and survey was conducted within each of the remaining buildings on the site. Cleanup costs were estimated based on the results of that investigation. The asbestos containing materials would be removed from the buildings. The estimated cleanup cost to remove the asbestos materials is approximately \$175,000. The contaminated groundwater will be remediated by boring through the concrete floor over this pool of petroleum and pumping out this petroleum , removing this from potential exposure pathways. The petroleum will be properly disposed. The estimated cost for the petroleum removal and disposal is \$80,000 The City anticipates a cost share of \$55,000-\$75,000 for site cleanup activities. This includes payment of Cleanup costs beyond the 200,000 USEPA Grant limit and labor hours during cleanup activities management, IEPA SRP fees, provision of security during Cleanup,

Task 4: Oversight of Site Cleanup

The oversight of the lead-based paint cleanup and asbestos containing materials is estimated to be approximately \$20,000. The oversight of City personnel and legal fees to finalize cleanup activities is anticipated to be \$10,000.

ii) **Leveraging:** The City of Rockford will make every effort to utilize the Illinois EPA River Edge Program to perform Cleanup at sites that have been assessed through the USEPA Assessment Grant Program. This will require the City to enter into Agreements with Developers on the basis of a Cleanup Plan and Draft No Further Remediation letter from Illinois EPA. This will be a serious challenge for the City, considering the low land values and land rents in this region, but the City will make every effort to tap into this resource. A total of \$1.7 Million has been set aside for the City of Rockford if the City can find Cooperative Development Partners.

In addition to River Edge, the City has used its TIF Bonding capability effectively in the redevelopment of two Brownfield sites. At the Reed-Chatwood Storage Site, TIF Bonding and a BEDI Grant were used to redevelop a corner of a Brownfield site for construction of new grocery store in 2003. IEPA Assessment Grant funds had been used for ESA work. This summer, the City of Rockford used its TIF Bonding Authority to leverage \$1.1 million to prepare a portion of the City Yards site for a \$10 million expansion of Liebovich Steel with an 80,000 square foot structure and creation of 10 jobs, initially. This is the first phase of a four phase expansion that will cost \$40 million and produce 40 jobs when complete. Liebovich Steel produces specialty steel components for building construction. Liebovich is landlocked on three sides and was faced with relocation if it could not expand south across Kent Creek into the City Yards property. The City Yards site had been a large J.I. Case manufacturing plant until approximately 1970. The TIF funds were used for assessment, drum removal, tank removal, and demolition of several large structures, asbestos abatement, transformer removal and free product removal. Liebovich Steel will also be investing approximately \$200,000 in the reconstruction of the Independence Avenue Bridge over Kent Creek. This bridge provides access to their expansion area.

The City expects that Developers will come forward when the City initiates Cleanup at this site using this proposed Grant.

c. Programmatic Capability

i. *Previous USEPA Grants* The Brownfields Coordinator, Wayne Dust, Planning Administrator for the City of Rockford, has 34 years of City Planning experience and has managed several USEPA Grants during the past six (6) years. During the summer of 2003, the USEPA Brownfields Pilot Grant was successfully closed out and confirmed by correspondence from USEPA. During the fall of 2003, the City of Rockford entered into a Cooperative Agreement with USEPA for two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2002-2003 grant cycle. Contracts were awarded to two (2) environmental consulting firms in January of 2004 and these assessment activities were completed during the spring of 2008 with numerous ESAs performed and all funds expended. Significant accomplishments of the 2004 Hazardous Substance Assessment Grant include: 1) partial completion of a Phase II ESA and Remedial Action Plan for the twelve (12) acre Barber Colman industrial complex, and 2) completion of a desktop Phase I for the fifty plus (50+) acre North and South Barber Colman Village Area. For the Petroleum Grant, Phase I ESAs were performed at 7 West State Street Corridor sites and 2 Downtown sites, including the four-block area which was later cleared and

is occupied by the new County Justice Center. The Quarterly Reports were prepared by Mr. Dust, submitted to USEPA, and approved on a regular basis. The FY 2004 Assessment Grants had been extended to September 30, 2008 and will be closed out by December 31, 2008.

During the fall of 2005, the City of Rockford entered into a Cooperative Agreement with USEPA concerning two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2004-2005 grant cycle. Contracts were awarded to three (3) Environmental Consulting firms during February of 2006 and this Assessment Grant was completed in the summer of 2008, with all funds expended. Major additional Phase II ESA work was performed at the City-owned Barber Colman sites. Phase I and Phase II ESAs were completed for the City-owned former Ingersoll site, a 5 Acre site on the bank of the Rock River. This site was then enrolled in the IEPA Site Remediation Program. Phase I ESAs were also performed on Keith Creek Greenway sites prior to City acquisition. For the Petroleum Grant, several additional Phase I ESAs and one Phase II ESA were performed in the West State and Downtown areas. Quarterly reports have been submitted by Mr. Dust, and approved on an ongoing basis for these Grants. The FY 2006 Assessment Grants had been extended to September 30 of 2008 and will be closed out by December 31, 2008.

The City of Rockford received a \$400,000 Community Wide Assessment Grant for the FY 2008 period. This grant has been used to complete Phase II ESA work at the Barber Colman Complex (Hazardous Substances) and for Phase I and Phase II ESA work at several Downtown Sites. This Grant is now 75 % completed and the remaining \$100,000 in this grant is committed to three sites. Three Cleanup Grants were received in 2008, and Asbestos Removal contracts have been awarded to implement a portion of this Grant.

The City of Rockford also received a Brownfields Revolving Loan Fund Award of \$500,000 in 2000. Under Mr. Dust's supervision, this Revolving Loan was used to Cleanup the Invensys Metal Plating site at Barber Colman, during 2005, to be used as a future section of the Riverfront Greenway along the Rock River. The Revolving Loan Fund Grant has been completed, with all funds expended, and closed out. This was confirmed by correspondence from USEPA. The City is taking steps to revolve these funds through legal action against the former property owner. In addition, two (2) Illinois EPA Assessment Grants totaling 240,000 were awarded, completed, and closed out during the 2001 through 2004 time period. These assessment efforts, together with the City's acquisition and clearing of a mixed industrial and commercial site, culminated in the receipt of the No Further Remediation letter from the Illinois EPA for the five (5) acre site acquired by the City of Rockford for the New Federal Courthouse, an \$80 million construction project which is now under construction by US General Services Administration.

There was only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by Mc Gladrey and Pullen for 2005. Finding 2005-7 stated that..."the City is required to submit quarterly reports to the U.S. EPA within 30 days after the end of each quarter that details expenditures and other activities under the programs, as well as progress being made at the clean-up sites. We noted that out of eight quarterly reports that should have been filed for the year ended December 31, 2005, six of the reports were late... The Cause stated "Delays in submitting the quarterly reports have been due to delays in receiving billings from the five Environmental Consulting firms under contract to perform the environmental work for the City.

Section 2.2 of the required quarterly report by USEPA requires documentation of the “Funds Expended” during the reporting period”. The Management’s Response by the City stated... “ If necessary, we are prepared to send an incomplete report to meet the USEPA Cooperative Agreement deadline to be followed by a final report when we have received all of the information”. It should be noted that all quarterly reports due starting July 30 2006 through the present have been submitted on time with the exception of two reports submitted only one day late.

During the past six years, the Rockford Brownfields Coordinator has made every effort to comply with the Cooperative Agreement and quarterly progress report requirements for the Assessment Grants, BCRLF and, more recently, the three (3) Cleanup Grants. The Brownfield Pilot Grant and the current Assessment Grants have been instrumental in preparing two (2) sites for major governmental facility construction projects. Assessment Grants have been used to perform Phase I and Phase II ESAs Environmental Assessments at the City-owned Barber Colman complex in preparation of this site for a possible Youth Sports Center. Letters of No Further Remediation have been received on a portion of the area comprising approximately one-third of the site. In addition to the proposed youth sports complex, it is the City’s intent to provide housing, riverfront open space, educational opportunities, and additional retail activity at this site following cleanup.

3. Community Engagement and Partnerships

a) Plan for involving the affected community: Rockford understands the importance of involving the community in Brownfield redevelopment. The City of Rockford has been actively involved in the community in its Brownfield initiatives. Wayne Dust, local Brownfield Coordinator and Planning Administrator for the City of Rockford, has presented an overview of the City’s intent to apply for USEPA Brownfield Assessment and Cleanup Grants at several of Alderman Victory Bell’s Fifth Ward meetings at the Montague Branch Library. An initial presentation was made at the June 26, 2008 Fifth Ward Meeting and a more detailed presentation was made at the September 25, 2008 Meeting. He provided a status report on current environmental assessment activities as well as identifying the City’s intent to apply for Assessment and Cleanup Grants and perform environmental assessments at additional locations within the Fifth Ward. It is important to note that the Public Hearing for the asbestos removal at the Rock Street Frontage, River Street Frontage and Machine Shop Sites at the Barber Colman Complex was held at the Montague Branch Library on April 24, 2008 and Alderman Bell’s Monthly Fifth Ward Meeting immediately followed the close of the public hearing. The people of the Fifth Ward have been kept well informed over the past several years of the City’s efforts to redevelop numerous Brownfield sites and have been very supportive of the City’s efforts. Mr. Dust will continue to provide status reports and seek input from the community at these Fifth Ward Meetings.

In addition to the efforts in the Fifth Ward, the Brownfields Coordinator has worked with Third Ward Alderman Douglass Mark on initial steps to inform the property owners of the North Madison Street Targeted Area of the City’s intent to redevelop this industrial area along the Rock River to retail and residential with a public pathway/ greenway along the Rock River. During May of 2006, all property owners were notified of the City’s intent to rezone the area from industrial to C-4 Commercial Downtown (mixed use). A Public Hearing was conducted as part of this rezoning process, and the rezoning was approved by City Council on November 6,

2006. Alderman Mark will hold Ward meetings to inform the property owners and surrounding residents of the status of redevelopment proposals and environmental assessment work. It should also be noted that the Third Ward includes the Ingersoll Site proposed for this Cleanup Grant.

b) Identification and establishment of state and local partners: Although the City of Rockford had been awarded two Illinois EPA (IEPA) Brownfield Assessment Grants some time ago, the recent designation of the City of Rockford River Edge Zone has created a major new opportunity to partner with IEPA on redevelopment projects on Brownfields sites requiring cleanups. The IEPA funds are severely restricted and do not include cleanup other than soil and groundwater. Combined with USEPA programs, however, the City will strive to tap into this valuable resource to accomplish the redevelopment of Brownfield sites. Mr. Dust has met with Mr. Doug Scott, IEPA Director concerning this new program.

The City is actively developing partnerships for redevelopment projects at the local, state, and federal levels. The City developed a Master Plan with the assistance of the Rockford Local Development Corporation (RLDC) for the Barber Colman Village area and is continuing discussions with potential developers. Working with the RLDC, a portion of the former Barber Colman facility was redeveloped, following assessment and cleanup, as a new grocery store, serving the surrounding area. Also the City has partnered with Winnebago County and the U.S. General Service Administration for the development of the Winnebago County Justice Center and the Federal Courthouse. Following assessment and cleanup activities, construction on the \$100 million dollar Winnebago County Criminal Justice Center was completed in July of 2007. The Federal Courthouse is now under construction and is expected to be at least an \$80 million project when completed late in 2009.

The City plans to develop additional partnerships to successfully accomplish sustainable development at the Ingersoll site as part of the redevelopment of the Ingersoll /Watch Factory targeted brownfield area located on the east bank of the Rock River in the Third Ward. This site is planned to become a Whitewater Park (kayaking and rafting) and be a venue for 2016 Olympics as part of the City of Chicago's proposal. To accomplish this will require a partnership between the City, who owns half of the proposed site, Commonwealth Edison, who owns the other half of the proposed site and the dam needed for this project, the Winnebago County Health Department located adjacent to the ComEd site and the Illinois Department of Natural Resources who has interest in modifying the dam to become a fish passage as well as serving the proposed Whitewater Park. The City of Rockford has hired HNTB to determine the structural integrity of the dam and the feasibility of re-watering the former hydro-electric plant water race. This \$187,000 investment by the City demonstrates the City's commitment to this project. The Rockford Park District is anticipated to own and operate the Whitewater Park when completed. Brownfield issues at this site include a former coal-fired powered generating plant, former hydro-electric plant, two (2) former foundries, a former transformer storage yard, and underground petroleum storage tanks. The USEPA could be a possible partner in this site for time critical removal actions similar to the Sparkle Cleaners site in Rockford during February of 2008

Successful redevelopment efforts at the Ingersoll Site will require partnership with the Rockford Park District because of the plan for Pathways and Greenway corridors through each of the

targeted areas. Also, the River District Association is actively involved in promoting the successful redevelopment of all of these areas because all of these areas will positively affect Downtown if successfully redeveloped.

c) Description of and role of the key community-based organizations

i) **The River District Association** is a private, 501 (c) 3 not-for-profit membership based organization with over 500 members. The Association's mission is to promote a growing , thriving, prosperous business and residential community in Rockford's Downtown neighborhood, the River District. The River District Board and Executive Director have met monthly with the City Administration and Community and Economic Development Department Staff including the City's Brownfield Coordinator , Wayne Dust, concerning Downtown Redevelopment. selection and prioritization of Brownfield sites. Brownfield initiatives at important Downtown sites have been priority items on these monthly agendas.. The representative from the River District is Kim Wheeler, Executive Director. Ms. Wheeler may be reached at 815.964.6221.

ii) **The Rockford Local Development Corporation (RLDC)** is a not-for-profit certified development company, by the Small Business Administration, that strives to be a champion for small business and economic development. RLDC has frequently partnered with the City, including the development of the Gray's IGA Store on South Main Street on a former Brownfield site and the Brownfields Cleanup at the former Invensys site. The RLDC recently partnered with the City of Rockford in the redevelopment of a portion of the Reed-Chatwood Storage Site for additional development of a medical clinic and general merchandise store. RLDC has also partnered with the City in the City's program to relocate families from the flood impacted Keith Creek floodway, an area where over 100 homes were severely damaged by two severe floods in less than one year's time. Mr. John Phelps is the Executive Director of the RLDC. His contact information is 815.987.8675

iii) **Southwest Ideas for Today and Tomorrow (SWIFTT)** is a membership based non-profit economic and community development organization working to attract and retain businesses and services to improve the quality of life for people who live and work in Southwest Rockford.. Nelson Richards is the Executive Director and he regularly attends Alderman Victory Bell's Monthly Fifth Ward Meetings to provide input and coordinate with the City. Mr. Richards's phone number is 815.965.3606.

iv) **Comprehensive Community Solutions, Inc. (CCS)** is a not-for-profit agency that provides job training, builds affordable housing and works to redevelop economically distressed neighborhoods in the City, including near the West State Street Corridor. The CCS YouthBuild program allows troubled youths the opportunity to develop their vocational skills on redevelopment projects. CCS has partnered with the City on several community development projects in several areas of the City. The Executive Director is Kerry Knodle, 815.963.6236.

v) **Rockford Area Economic Development Council (RAEDC)** as the regional economic development council, partners with the City of Rockford and the other local governments in this region in its primary role, "to help employers retain and create quality jobs". This partnership fits well with the RAEDC's four public policy priorities, especially the priority of a

“Coordinated Regional Economic Development Plan” , a plan that results in the area being prepared for economic development. The RAEDC can help the City redevelop its Brownfield sites when they have been prepared for redevelopment. City staff of the Community and Economic Development Department meets weekly to review current issues and opportunities. The Brownfields Coordinator is included in specific meetings for certain issues. Ms. Janyce Fadden is the President of the RAEDC and her contact number is 815.987.8118

In addition to the community organization listed above, the City of Rockford frequently partners with the Rockford Park District for the development of Greenways and pathways on Brownfield sites. The Rockford Park District is a separate regional taxing district with an elected governing board. The Director of the Rockford Park District is Tim Dimke, 815.987.8800.

4) Project Benefits

a) Welfare and Public Health: The Ingersoll Site is located on the Rock River I and plans for this site incorporate the City of Rockford and Rockford Park Districts plans for a continuous system of Greenways and Pathways along the Rock River and linking with the major regional pathway system including the Grand Illinois Trail. These plans include the focus on walking, non-motorized transportation, and in bad weather, public transportation, as the primary means of transportation to work or for recreation. This focus on creating several development nodes that encourage non- motorized transportation as part of this lifestyle is an important means of preventing pollution and promoting personal health. In addition, the Greenways Plan includes converting one of the three (3) railroad trestles across the Rock River to a pedestrian bridge linking the recreation paths on either side of the river near this site.

b) Economic Benefits and/or Green space

i) Economic Benefits: Without the City’s concern for the redevelopment of Brownfields within the Rock River Corridor and the USEPA programs to assist with these redevelopment efforts, there is considerable evidence that Brownfield Areas would simply expand and intensify over time as more and more industrial buildings approach the end of their useful life. Instead, many buildings along the Rock River Corridor have been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of these areas. In the case of the Ingersoll site efforts to prevent Brownfields include the plan to include the underutilized and largely-vacant watch factory, the vacant Commonwealth Edison site, previously described, and the Ingersoll facility, which had manufactured many different products over the years. It is the City’s intent to relocate the tenant at the Watch factory to an appropriately sized facility as the watch factory is redeveloped to mixed office and residential uses that would compliment the Whitewater Park and public open space at the Ingersoll and Com Ed site. All these plans include adaptive reuse or redevelopment of these areas to replace Brownfield properties with residences, retailers, offices, and public destination points, all of which contribute to the tax base as these areas are revitalized .All include retail services for the surrounding community job creation. Prevention of Brownfields and preventing existing Brownfields from expanding or intensifying is extremely important to surrounding neighborhoods, which, as demonstrated in Section 1 , are already economically disadvantaged.

ii) Other non-economic benefits for sites to be used for green space The City's primary non-economic benefit goal within the Brownfield Program is to provide adaptive reuse and/or redevelopment of these Brownfield areas to include a major public open space component consistent with the Rockford Park District's Greenway Plan for a continuous recreational path greenway corridor along both sides of the Rock River with city parks, boat launches and other major facilities at various points within the system and designed to compliment the City's redevelopment efforts. This goal is integrated with the economic development goals because public access to the riverfront will be restored even though adjacent property will be restored to private ownership and the tax base. The restoration of the public access benefits the desirability of the area as a place to live work and play. The Ingersoll Site as part of the Ingersoll /Watch Factory Target area, for example, has potential for enhanced property values and economic benefits due to increased tourism activity, restaurants, and other retailers and additional landscaped public open space. Rockford is committed to including Green space and open space in urban redevelopment strategies for Brownfields sites. The 2020 Plan for Rockford places an emphasis on smart growth techniques, which includes making a commitment to preserving the Green space that is available to the City and preventing the consumption of land on the City's fringe. Protecting and preserving the Rock River Corridor also provides a major amenity to the redevelopment taking place in these same Brownfield areas.

A high priority for the City is the redevelopment along the Rock River. Recreational use along the Rock River is consistent with the River District Framework Plan as well as the Rockford Park District Plan for continuous recreational paths along both sides of the Rock River. Davis Park is an existing park along the west bank of the Rock River and serves as an anchor to the south end of Rockford's Downtown. To the south are three (3) additional Targeted Areas: South Main Street/ Water Power District, Barber Colman Village North and the Barber Colman complex. Successful creation of the Greenways as planned would provide: a) a continuous Pathway from Davis Park south for two miles; b) a pathway connecting with the Davis-Pec Prairie Path and serving as a section of the Grand Illinois Trail; c) planned public Fishing Parks near the dam and where Kent Creek enters the Rock River and d) a major access point to the trail system at an expanded South Park. It is important to note that the plan to reuse one of the three railroad bridges across the Rock River will connect the Ingersoll Site with the Davis –Pec Path and the Regional Pathway System.

c) Environmental Benefits from Infrastructure Reuse/ Sustainable Reuse. Each of these important goals will be incorporated into our redevelopment efforts with the Rockford Park District. A major component of the infrastructure reuse will be the improved public access to the Rock River, which is an important part of the City's infrastructure as it is legally designated as a public right-of-way. All public utilities in these Targeted Brownfield areas will be better utilized with redevelopment. Native landscaping will be restored as the greenway system paralleling the Rock River is completed. Also, the Whitewater Park, proposed to utilize existing Commonwealth Edison (COM ED) and the Ingersoll Site on the Rock River, includes a fish passage through the existing COM ED dam, restoring native fish upstream. The City and Rockford Park District would have several opportunities to develop storm water management and reuse innovations, especially the ability to incorporate water quality improvements and water features into the Rock River Corridor Greenway program. Some of the best opportunities for these innovations will be at riverfront locations where large industrial structures have been

removed or will be removed as part of the redevelopment efforts. The majority of these riverfront factories were built on fill from demolition of previous structures giving the City the opportunity to address both storm water and debris/fill issues at the same time.

d) Plan for Tracking and Measuring Progress We understand the importance of identifying the outcomes and outputs for our Brownfields Program. Agencies that award federal grants funds require the reporting of these outcomes and outputs to help justify the use of their funds and to secure the future of their funding programs. We will demonstrate to U.S. EPA the important outcomes and outputs of our Brownfield Project by regularly updating the ACRES System for each site that is targeted for assessment. We will specifically identify the following:

Outcomes of Assessment Grant Funding:

- Acreage of land in which environmental threats have been characterized
- Acreage of land positioned for reuse
- Jobs leveraged
- Funding leveraged
- Acreage of green space created or preserved

Outputs of Assessment Grant Funding:

- Phase I Environmental Site Assessments at NUMBER (X) to NUMBER (X) sites
- Phase II Environmental Site Assessments at X to X (X-X) sites (will vary depending on outcome of Phase I ESAs). Phase II Environmental Site Assessments will sample for the Illinois EPA Target Compound List (TCL) that includes volatile organic compounds, semi-volatile organic compounds, metals, pesticides, and PCB's all to position the site for enrollment in the SRP if contamination is discovered. While the TCL laboratory work is expensive, it allows a site to be enrolled into the SRP as a "Comprehensive" site.
- Enrollment of X (X) to X (X) sites into the Illinois Environmental Protection Agency's SRP as "Comprehensive" sites, providing the greatest degree of protection with the final No Further Remediation (NFR) letter received at the end of the SRP process.